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March 24, 2021

Floyd, et al. v. City of New York, 08-CV-1034 (AT)
Ligon, et al. v. City of New York, et al., 12-CV-2274 (AT)
Davis, et al. v. City of New York, et al., 10-CV-0699 (AT)

Dear Judge Torres:

We are counsel to the Monitor, Peter L. Zimroth, and respectfully write to request a sealing order in the above-captioned matters. Plaintiffs in these matters notified the Monitor that they will seek to file information that is confidential under this Court's order of October 11, 2018 with a motion they intend to submit at 5 p.m. on March 25, 2021. *See Floyd v. City of New York*, 08-cv-1034 (AT), ECF No. 650 (Oct. 11, 2018). Pursuant to paragraph 8 of that order, *id.* at 6, the Monitor respectfully moves this Court for an order requiring Plaintiffs to file that confidential information under seal, because the "privacy interests" that support sealing each and every piece of that information outweigh the "presumption of public access," *see Brown v. Maxwell*, 929 F.3d 41, 51 (2d Cir. 2019).

A letter elaborating the reasons in support of that sealing order, as well as exhibits displaying the confidential information subject to that order, have been

contemporaneously filed under seal for this Court's review in conformity with practice IV.A.ii. of this Court's Individual Practices in Civil Cases. For the reasons provided in more depth in that letter, this Court should enter the sealing order attached as Appendix 1 to this letter.

Respectfully submitted,

/s/ Benjamin Gruenstein

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BY ECF